

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF NEW YORK (Syracuse)

ADLIFE MARKETING & COMMUNICATIONS  
COMPANY, INC.,

Plaintiff,

- against -

BUCKINGHAM BROTHERS, LLC

Defendant.

Docket No. 5:19-cv-796 (LEK-ATB)

**NOTICE OF MOTION**

**PLEASE TAKE NOTICE** that, upon this Notice of Motion; the declaration of Richard Liebowitz and exhibits attached thereto, the Statement of Damages and the pleadings and prior proceedings herein; Plaintiff Adlife Marketing & Communications Company, Inc., will move the Court, before the Honorable Lawrence E. Kahn (U.S.D.J.) at the United States District Court, 100 S. Clinton St., Syracuse, NY 13261, at a time and place determined by the Court for an Order GRANTING Plaintiff's application for default judgment in the amount of \$30,000.00 in statutory damages under 17 U.S.C. § 504(c); \$2975.00 in attorneys' fees and \$480.00 costs under 17 U.S.C. § 505; and for such further relief as this Court deems just and proper.

**PLEASE TAKE FURTHER NOTICE** that Defendant's opposition papers, if any, must be served within 21 days after service of these motion papers upon Defendant via its last known business address.

Respectfully Submitted,

LIEBOWITZ LAW FIRM, PLLC

/richardliebowitz/

Richard Liebowitz, Esq.  
11 Sunrise Plaza, Ste. 305  
Valley Stream, NY 11580

*Counsel for Plaintiff*

TO:

BUCKINGHAM BROTHERS, LLC  
45 Redfield Street  
Constantia, New York 13044

*Defendant*